

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

---

C.A.	:
	:
	:
v.	:
VILLANOVA UNIVERSITY; COLLEGE	:
HALL ASSOCIATES, L.P. d/b/a COLLEGE	:
HALL APARTMENTS a/k/a "THE	:
COURTS"; MARKS & COMPANY USA,	:
INC., d/b/a MARKS & COMPANY; ELIJAH:	
JOSEPH KATZENELL; JUAN	:
EGUIGUREN; and ANDREW POLUN	:
	:

---

**NO. 2:24-CV-04434-KNS**

**DEFENDANT ELIJAH JOSEPH KATZENELL'S ANSWER TO CODEFENDANT,  
ANDREW POLUN'S NEW MATTER CROSSCLAIMS**

**AND NOW** comes the Defendant, Elijah Joseph Katzenell, by and through his attorneys, Goldberg, Miller & Rubin, P.C. and reply to Codefendant, Andrew Polun's New Matter Crossclaims as follows:

206. This is an incorporation paragraph, of which no response is required.
207. Denied. Answering Defendant is advised by counsel and, therefore, avers that the allegations contained in the corresponding paragraph of the Codefendant, Andrew Polun's New Matter Crossclaims are automatically deemed denied as conclusions of law to which no responsive pleading is required. Strict proof thereof is demanded at trial, if material.

**WHEREFORE**, Answering Defendant demands judgment in its favor and against all other parties and persons. In the alternative, Answering Defendant demands judgment of indemnification and contribution against all codefendants, and for such other costs, attorney's fees and interests as the Court deems just and proper.

**GOLDBERG, MILLER & RUBIN, P.C.**

BY: \_\_\_\_\_/s/\_\_\_\_\_

EAMON MERRIGAN, ESQUIRE

Attorney for Defendant

Elijah Joseph Katzenell

Date: February 7, 2025

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

---

C.A.	:	
	:	
v.	:	
VILLANOVA UNIVERSITY; COLLEGE	:	
HALL ASSOCIATES, L.P. d/b/a COLLEGE	:	
HALL APARTMENTS a/k/a "THE	:	
COURTS"; MARKS & COMPANY USA,	:	
INC., d/b/a MARKS & COMPANY; ELIJAH:	:	
JOSEPH KATZENELL; JUAN	:	
EGUIGUREN; and ANDREW POLUN	:	
	:	NO. 2:24-CV-04434-KNS

**CERTIFICATION OF SERVICE**

I, Eamon Merrigan, Esquire, hereby certify that a true and correct copy of the foregoing Defendant, Elijah Katzenell's Answer to Codefendant, Andrew Polun's New Matter and Crossclaim has been forwarded to all counsel of record via U.S. Mail, postage prepaid and/or electronic mail.

**GOLDBERG, MILLER & RUBIN, P.C.**

BY: \_\_\_\_\_/s/  
EAMON MERRIGAN, ESQUIRE  
Attorney for Defendant  
Elijah Joseph Katzenell

Date: February 7, 2025